

DOCKET SECTION
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
FOLLOW-UP INTERROGATORIES TO
UNITED STATES POSTAL SERVICE
(OCA/USPS-95-97)
September 29, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

GAIL WILLETTE

Director

Office of the Consumer Advocate

Shelley S. Dreyfuss

SHELLEY S. DREIFUSS

Attorney

OCA/USPS-95. Please refer to witness Lion's response to OCA/USPS-T24-79d, and the table below.

CAG	Nondelivery Facilities	Boxes Installed	Boxes In Use	General Delivery Customers	Customers Subject to the Quarter Mile Rule
[1]	[2]	[3]	[4]	[5]	[6]
A	3				
B	1				
C	6				
D	2				
E	18				
F	59				
G	197				
H	412				
J	874				
K	2622				
L	714				
NA	37				

Please complete the table.

OCA/USPS-96. Please refer to witness Lion's responses to OCA/USPS-T24-79d, and OCA/USPS-T24-73c.

- a. Please confirm that classified offices and contract stations can be "nondelivery facilities." If you do not confirm, please explain.
- b. In OCA/USPS-T24-79d, please provide, in total and for each CAG, the number of "nondelivery facilities" that are
 - i. contract stations, and
 - ii. classified offices.

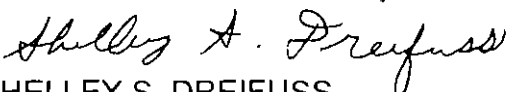
- c. In OCA/USPS-T24-73c, for the column "Sept. 1997 Contract Stations," please provide, in total and for each CAG, the number of contract stations that are
 - i. "nondelivery facilities," and
 - ii. delivery facilities.

OCA/USPS-97. Please refer to witness Lion's response to OCA/USPS-T24-79d.

- a. Please define the term "facility" as used in the response. Please explain.
- b. Is there a one-to-one relationship between facility and post office or finance number? Please explain.
- c. Is there a one-to-one relationship between facility and 5-digit ZIP Code?
- d. Can a facility be associated with more than one finance number? If so, please explain.
- e. Can a finance number be associated with more than one facility. If so, please explain.
- f. Can a 5-digit ZIP Code be associated with more than one facility? If so, please explain.
- g. Can a facility be associated with more than one 5-digit ZIP Code? If so, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
September 29, 1997